

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

LOIS OUZTS
Plaintiff

CIVIL ACTION NO. 1:16-cv-00277

VERSUS **JUDGE DRELL**

LEEBOS STORES, INC. **MAGISTRATE JUDGE PEREZ-MONTES**
Defendant

AMENDED COMPLAINT

NOW INTO COURT, through undersigned counsel, comes the plaintiff **LOIS OUZTS**, who wishes and is entitled to amend her original complaint in the following respects:

1.

By amending paragraph I of her original complaint to read as follows:

“I.

Made defendants herein are:

- a) **LEEBOS STORES, INC.** (hereinafter referred to as “Leebo’s”), a Louisiana corporation domiciled in the Parish of Rapides, State of Louisiana and whose registered agent for service of process is John Lance Harris, 4824 Porter Circle, Alexandria, Louisiana, 71303; and
- b) **STOKES-HARRIS ENTERPRISES, INC.** (hereinafter referred to as “Stokes”), a Louisiana corporation domiciled in the Parish of Rapides, State of Louisiana and whose registered agent for service of process is John Lance Harris, 4824 Porter Circle, Alexandria, Louisiana, 71303.”

2.

By adding a paragraph V(a). to her original complaint to read as follows:

“V(a).

At all times subsequent to plaintiff being promoted to Director of Operations as described above, plaintiff was employed by defendant Leebo’s and/or defendant

Stokes or both. Any subsequent reference to the term ‘defendant’ after this amended paragraph of the complaint refers to either Leebo’s or Stokes or both.”

3.

Plaintiff reaffirms each and every allegation of her original complaint, except as amended herein, as though set forth in full herein.

WHEREFORE, plaintiff prays that:

1. Judgment be rendered against the defendants and prays that this Court award plaintiff back wages, statutory liquidated damages and such other monetary award as may be deemed appropriate in amounts to be determined at trial, but in no event less than \$250,000.00;
2. That plaintiff seeks to recover from defendants pre-judgment interest on any amount awarded to the maximum extent permitted by law;
3. That plaintiff recover from defendants her costs, including reasonable attorney fees;
4. That a trial by jury be held; and
5. That this Court award such other further relief as may be provided by law and be just and equitable.

Respectfully submitted:

BROUSSARD, HALCOMB & VIZZIER

By: ___ s/Daniel E. Broussard, Jr. _____

DANIEL E. BROUSSARD, JR. (#3510)

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE

I hereby certify that I have this day forwarded a copy of the above and foregoing Motion and Order for Leave to File Amended Complaint and Amended Complaint to all counsel of record via electronic filing, on this 28th day of July, 2016 at Alexandria, Rapides Parish, Louisiana.

_____s/Daniel E. Broussard, Jr._____
DANIEL E. BROUSSARD, JR.